HPA
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Evolution of California Reentry Periods

Aug., 1963: 94 peach pickers ill, parathion residues, Stanislaus County. Investigated by T.R.Milby and F. Ottoboni, Ca. Dept. Pub. Hlth. Total application during season implicated, rather than reentry interval.
Aug., 1964: "Parathion Residue Poisoning Among Orchard Workers," JAMA.

Dec. 20, 1968: Cal. Adm. Code, Title 3, Chap. 4, Subch. 1, Group 2, Article 21, Section 2462: posting of premises treated with parathion, methyl parathion, or EPN for 14 days after application. (But only for "warning." Reentry not specifically prohibited.)
(Date?): Jerry Fielder, Director of Ag., appoints Subcommittee on Worker Safety as part of Pesticide Advisory Committee. T.R.Milby, chairman; Dwight Culver, member.

Sept., 1969: California Rural Legal Assistance, through Sen. Nicholas Petris, introduces omnibus pesticide safety bill; but includes no mention of reentry periods.

Nov. 22, 1969: Milby testifies before Select Subcommittee on Labor, House of Representatives Committee on Education and Labor; mentions possible compulsory ChE testing, etc.; no mention of reentry periods.

Nov. 28, 1969: Preliminary results of Tulare County farm workers' health survey become available. "Of 1,120 farm workers, 982 (87.7%) reported experiencing one or more symptoms which might plausibly have been the result of contact with pesticides" (compared with 34.3% of a control group), etc.

Dec. 4, 1969: Milby and Culver submit first report of Subcommittee on Worker Safety; no mention of reentry periods.

Feb. 19, 1970: Jerry Fielder bans DDT.

March 19, 1970: Cal. Dept. of Ag. pesticide use reporting system goes on line.

March 23, 1970: DPH still talking about compulsory ChE testing of everyone entering a field sprayed with an organic phosphate within previous 30 days (meeting of Milby, Kahn, et al.)

April 20, 1970: Subcommittee on Worker Safety meeting hears from Herb Cohen, counsel to Cal. Dept. Ag., asking that "waiting periods" be drawn up immediately "to get CRLA off our backs." Referred to ad hoc committee of Milby, Guy McLeod (entomologist, UC), and Blair Bailey (another UC entomologist).

May 4, 1970: J. Lorenz of CRLA meets with Milby & Culver to negotiate "demands." They do not include reentry periods, but Culver indicates intervals have already been drawn up in response to H. Cohen request.

May 5, 1970: Milby and Culver present general concepts and specific recommendations to Fielder's Pesticide Advisory Committee. Only grapes and peaches covered.

On or about June 1, 1970: Second set of recommendations issued; citrus now included.

On or about June 1, 1970: DPH advised of 3 episodes of OP poisonings in lower San Joaquin Valley, involving ca. 16 citrus workers; Delnav, Dibrom, Ethion, Guthion, and parathion implicated. DPH recommends that Dept. of Ag. issue emergency regulations: 30 days for latter 3 compounds in citrus. Fielder does so.

June 19, 1970: Emergency regulations go into effect.

June 18, 1970: Blair Bailey reveals he has been asked by manufacturers of Ethion and Guthion to supervise reentry studies. Members of Community Studies on Pesticides criticise research design.

July 24, 1970: Niagara Chemical begins human study, testing reentry intervals of 3-7 days for Ethion, on oranges.

August 24, 1970: Chemagro begins human study, testing reentry period of 7 days for Guthion, on oranges.

Aug. 27, 1970: Blair Bailey begins human study of Zolone, Dibrom, Ethion & Guthion on grapes.

Sept. 15, 1970: Niagara Chemical submits report, asking that 30-day emergency regulation be rescinded.

Sept.16, 1970: Cal. Dept. of Ag. announces "guidelines" of 1-3 days for parathion on lettuce.

Sept. 22, 1970: Representatives of Niagara Chemical try to get DPH support for their argument (i.e., that Ethion have no reentry period).

Oct. 6, 1970: Anderson memo analysing Niagara study, proving ChE was significantly depressed.

Oct. 7, 1970: Chemagro completes its report on Guthion reentry study.

Oct. ~~22~~ 14, 1970: Chemagro reps. meet with state PH, Ag., UC, etc., to argue for reduction of Guthion reentry interval from 30 to 7 days. Anderson prepares another rebuttal, based on statistical analysis of cholinesterase depression.

November 2, 1970: Ad hoc group of Milby, Culver, Hillis (DA), Swift (UC), Carter (CPG), Serat, Mengle, and Anderson (DPH) discusses periods for all OP's registered for citrus, grapes, and peaches-nectarines. These are communicated to Fielder.

November 11, 1970: Hercules reps. meet with Milby, Culver, et al., to protest period proposed for Delnav.

~~March 6, 1971~~ Dec. 15, 1970: Community Studies on Pesticides annual report includes manufacturers' reentry studies, with DPH analysis.

Jan. 6, 1971: Reps. from UC Riverside argue for exemption of Delnav on grounds residue studies are still in progress.

On or about Jan. 11, 1971: DA issues proposed regulations, based generally on recommendations of Nov. 2, 1970, meeting; to be subject of public hearings on Feb. 11.

On or about Jan. 20, 1971: Results of Bailey grape study of Zolone, Dibrom, Ethion, and Guthion become available.

Feb. 3, 1971: Anderson analysis of Bailey data.

February 11, 1971: DA hearing, Sacramento. No formal opposition to proposed reentry intervals.

March 1, 1971: Analysis of Bailey data by Serat, suggesting longer waiting periods needed for Zolone and Guthion on grapes.

March 3, 1971: Meeting of DA Pesticide Advisory Committee hears presentations by Serat and Anderson re longer periods than called for in January proposals; appoints subcommittee.

March 24, 1971: Subcommittee of Milby, Swift, and Bartelt meets w/ Serat, Mengle, Anderson, Bingham, Hillis, Bailey, and Tabershaw to set "final" figures.

March 25, 1971: Swift circulates letters from industry and ag. extension agents re economic effects of proposals.

April 1, 1971: Meeting at Riverside w/Milby, Bingham, Swift, Bailey, Serat, Mengle, Anderson, Gunther, Carman, and rep. of Hercules to discuss Delnav and other remaining controversies.

April 2, 1971: Meeting in Berk. with reps. of Rhodia re Zolone. Anderson letter to Bingham.

April 5, 1971: Serat letter to Fielder.

April 6, 1971: Milby letter to DA.

May 14, 1971: DA announces new regulations.
June 14, 1971: Blair Bailey begins peach thinner study.
June 15, 1971: Regulations become effective.

June 22, 1971: At meeting of Entomological Society, Sacramento, Milby describes how reentry intervals were derived.

October 15, 1971: 120 day period for comment on regulations expires without incident.

Oct. 27, 1971: DA Pesticide Advisory Committee considers possibility of reentry periods for other crops.

April 18, 1972: Interagency meeting on "Agricultural Worker Safety and Pesticides", UC Irvine, considers reentry periods in light of recent studies (and industry pressure). No changes.

1972 (date?): A.B. 246 enacted, calling for "development of regulations relating to pesticides and worker safety (by) the Department of Agriculture and Department of Public Health" to include "time limits for worker ~~re~~entry..."

April 4, 1973: Appointment of new Worker Safety Subcommittee by Director of Agriculture. E. Kahn (chair), D. Culver, K.Maddy, and B.Bailey.

May (?), 1973: Worker Safety Subcommittee proposes, and Pesticide Advisory Committee adopts general principles on reentry, including no "tampering" with existing numbers or adding new ones without hard supporting data; and calling for controlled reentry studies as a precondition to pesticide registration.

June, 1973: W. Serat and B. Bailey conduct study of apple thinners and Guthion, Sonoma County.

July ~~[illegible]~~, 1973: UC School of Public Health conducts study of orange pickers and parathion, Tulare County.

September 11,1973: DPH submits recommendations to DFA pursuant to A.B. 246.

Oct.-Nov., 1973: Negotiations between DPH and DFA, particularly regarding Zolone reentry

Jan. 4, 1974: ~~[illegible]~~ Public hearing on new regulations.

January 7, 1974: Regulations ~~[illegible]~~ promulgated by DFA, effective immediately as emergency.
May 9, 1974: Permanent regulations promulgated; some intervals lowered by DFA.
February 27, 1974: Final meeting of Worker Safety Subcommittee. Thereafter, Ephraim Kahn, M.D., Pesticide Coordinator of DPH stands almost alone in resisting efforts by manufacturers, DFA, UC Davis, etc., to lower reentry intervals for Zolone on grapes, Guthion on peaches, etc. (He has an informal DPH committee of W. Serat, D. Mengle, A. Ottoboni, and L. Scott.)

~~May 27, 1976: No changes in reentry intervals promulgated.~~

1975 (date?): Interval for methyl parathion on grapes lowered from 21 to 6 days for Monterey County only, with DPH approval, on basis of residue data generated by UC Extension Service, Monterey Co. Ag. Dept., etc. (See Jan. 3, 1974 memo)

April, 1976: DFA proposes many changes in Worker Safety Regulations, including reentry periods for new three materials. ~~[illegible]~~ DPH opposes addition of Omite, on grounds of absence of data. Series of three public hearings. As of this writing (May 23, 1976), final modifications still under consideration.